



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

March 6, 2025

**BY ECF AND EMAIL**

The Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Richard Zeitlin, 23 Cr. 419 (LAK)**

Dear Judge Kaplan:

On December 10, 2024, the Court sentenced the defendant to a term of 121 months' imprisonment to be followed by five years of supervised release, following his guilty plea, pursuant to a plea agreement, to one count of telemarketing wire fraud conspiracy, in violation of 18 U.S.C. §§ 1349 and 2326. (Dkt. 107). The Court also entered a consent order of restitution (the "Restitution Order"), signed by the Government, the defendant, and defense counsel, and consistent with the terms of the parties' plea agreement, directing the defendant to pay restitution in the amount of \$8,906,706.00. (Dkt. 106). The Restitution Order provides that the Government "shall submit[ the Schedule of Victims] to the Court . . . within 90 days of sentencing." (Dkt. 106 ¶ 1). The Government respectfully requests an additional 30 days to submit the Schedule of Victims. The additional time will permit the defense to review the Schedule of Victims and the parties to potentially resolve disputes prior to its submission to the Court.

Respectfully submitted,

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cc: Defense Counsel (by ECF and Email)